



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

February 8, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Equivoice Inc. CPNI Certification
EB Docket No. 06-36; CY2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Equivoice Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

tms: FCCx1901

Enclosures
ST/im

EB Docket 06-36

Date _____

Statement of CPNI Procedures and Compliance

Equivoice Inc.

Calendar Year 2018

Attachments: Accompanying Statement explaining CPNI procedure

Statement of CPNI Procedures

Equivoice, Inc. ("Equivoice") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Equivoice does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers. The Company has a strict policy prohibiting the disclosure of CPNI to any third parties, unless required to do so by law (e.g., in response to a subpoena).

Equivoice has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Equivoice has adopted and distributed to all employees a confidentiality policy that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

Equivoice does not provide any telephone or in-store access to CPNI, including call detail. Customers requesting CPNI over the telephone will be provided with CPNI only by sending it to the customer's address of record or by calling the customer at the telephone number of record.

Equivoice has instituted authentication procedures to safeguard the disclosure of call detail online. Customers may access their CPNI online only after they have been authenticated without the use of readily available biographical information or account information. After initial authentication, customers may only access CPNI online by providing a password that is not prompted by a request for readily available biographical information or account information. Customers who have lost or forgotten their passwords may retrieve them by providing an answer to a shared secret question. If the customer cannot provide the correct password or correct response to the shared secret question, the customer must be re-authenticated and establish a new password.

Equivoice has put into place procedures to notify customers whenever a password, shared secret question for a lost or forgotten password or address of record is created or changed without revealing the changed information or sending the notification to the new account information. If a change is made, Equivoice notifies the customer immediately by email to the customer's email address of record or by a call to the customer's telephone number of record of any changes to the customer's password, shared secret question, online account information or address of record. This notice does not reveal the changed information and is sent to the existing (previous) address or telephone number of record only, and not to the changed address or number.

Equivoice's operating procedures require notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. Equivoice maintains written records of any breaches discovered and notifications made to the USSS and the FBI, and to customers for two (2) years. These records include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach and the circumstances of the breach.

Equivoice has not developed any information with respect to the processes they are using to attempt to access CPNI but does take steps to protect CPNI as described herein.